

October 31, 2012

Anthony Herman, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

2012 NOV 19 AM 11:28

OFFICE OF COMMISSIONER

MUR #66097

Re: *Complaint Against Unknown Respondent (and upon information and belief League of Conservation Voters, Montana Conservation Voters, and Montana Hunters and Anglers).*

Dear Mr. Herman:

This letter constitutes a formal complaint filed pursuant to 2 U.S.C. §437g(a)(1), based upon information and belief, against Montana Hunters and Anglers Leadership Fund, Montana Conservation Voters and League of Conservation Voters, purported "non-partisan" 501(c)(4) organizations. Based upon information and belief, set forth below and in the attached materials, the Republican Party of Montana files this complaint seeking an immediate investigation by the Federal Election Commission ("FEC" or "Commission") into the illegal spending practices of these organizations, who have publically announced a political partnership between the three organizations to influence the Montana U.S. Senate election in favor of Senator Jon Tester. Specifically, these groups have conspired to mail a public communication without any disclaimer.

The public record makes clear, and an investigation will no doubt confirm, that there is reason to believe that one or all of these groups is in violation of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"), and Commission regulations.

FACTUAL BACKGROUND

With Senator Tester trailing in public polls, the liberal partnership of third party groups announced on July 10, 2012 including the Montana Hunters and Anglers Leadership Fund, the Montana Conservation Voters and the League of Conservation Voters has engaged in a duplicitous strategy of supporting the libertarian candidate, Dan Cox, in a desperate attempt to syphon votes away from Congressman Denny Rehberg.

This partnership has announced significant expenditures on television and in mailings in the final weeks of the election, including a television ad for Dan Cox, clearly laying out their desperate end-game strategy. Consistent with that strategy, they have blanketed Montana with a mass mailing that expressly advocates for Dan

Anthony Herman, Esq.
October 31, 2012
Page 2

Cox's election. A true and correct copy of the mail piece is attached hereto as Exhibit A. In a tacit acknowledgement of their strategy's dishonesty, however, the partnership's mailer does not include a disclaimer.

LEGAL ANALYSIS

The Mail Piece Violates the Act by Failing to Include the Required Disclaimer.

The mailer expressly advocates for the election of Dan Cox. As such, it is required to contain a disclaimer identifying the sponsor of the communication, and whether it was authorized by any candidate or candidate's committee. 11 C.F.R. § 110.11(b). Indeed, the FEC regulation contains an entire section specifically dedicated to the disclaimer requirements for printed materials.

The mail piece includes no disclaimer. The partnership has violated federal law.

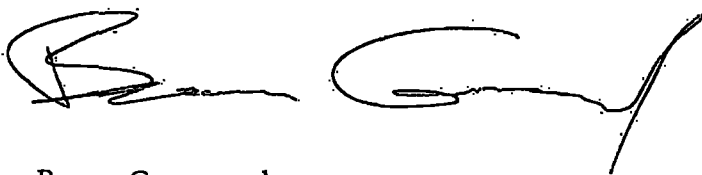
Conclusion

The Montana Hunters and Anglers Leadership Fund, Montana Conservation Voters and the League of Conservation voters are well aware that Montanans would not take kindly to well-known liberal groups targeting conservative voters in a ham-handed attempt to push them off of voting for Rehberg, and so they simply opted to ignore federal law, and not identify themselves.

Accordingly, the Republican Party of Montana respectfully requests that the Commission conduct a thorough investigation on an expedited basis into the violations outlined above and enter into a prompt conciliation with the respondents to remedy the violations that are found and to ensure that these violations immediately cease and do not reoccur.

The above is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bowen Greenwood', with a stylized flourish at the end.

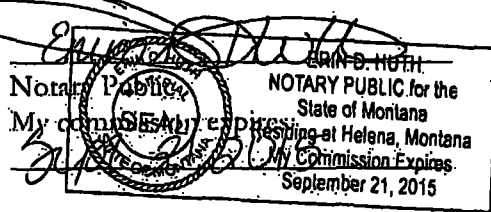
Bowen Greenwood
Executive Director, Republican Party of Montana

Anthony Herman, Esq.

October 31, 2012

Page 3

Sworn to and subscribed before me on this ____ day of October, 2012.



1-800-244-1444

Congressman Dennis Rehberg has requested more earmarks than any other House member.

He requested at least \$100 million in earmarks in FY 2010 alone. It's no surprise that Congressman Rehberg helped a lobbyist, who was later convicted of bribing public officials and was associated with Jack Abramoff, secure millions of dollars in earmarks.

REHBERG WAS VOTED
"BIGGEST PIG" IN CONGRESS
 BY CITIZENS AGAINST GOVERNMENT WASTE

SECRET#C 006

PRST STD
U.S. POSTAGE
PAID
LAS VEGAS, NV
PERMIT NO. 7811

(3) The independent variable Time_i is the time in days from the onset of the outbreak to the day of the survey.

To learn more, visit: www.DanCox4Senate.com.

ଅନୁସନ୍ଧାନ

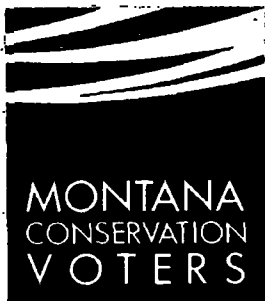


DAN COX: A champion for fiscal responsibility

Dan Cox knows that Montana needs less government spending – not more. He is a true conservative who believes that Montanans, not the government, should be trusted to live their lives. He opposed the stimulus, is against any big bank bailout, and will fight all forms of unconstitutional spending. Dan Cox will protect our freedom and stop big government overspending.



Say no to wasteful spending.
Say yes to economic freedom.



December 5, 2012

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

RECEIVED

2012 DEC 14 AM 7:08

FEC MAIL CENTER

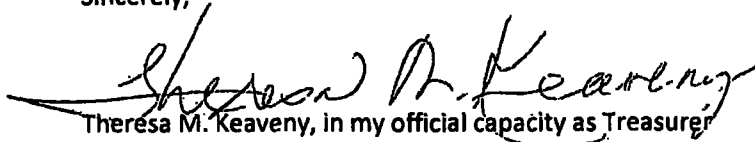
RE: MUR # 6697

Dear Sir or Madam,

Enclosed please find a completed "Statement of Designation of Counsel" from Montana Conservation Voters and myself in regards to MUR # 6697.

Thank you.

Sincerely,


Theresa M. Keaveny, in my official capacity as Treasurer

CC: Michael B. Trister
Rea Holmes

P.O. Box 63
Billings, MT 59103
406.254.1593 P
406.254.1609 F

P.O. Box 9335
Missoula, MT 59807
406.542.1055 P/F

www.mtvoters.org
mcv@mtvoters.org



RECEIVED
FEC
2012 DEC 14 PM 3:22
OFFICE OF
COUNCIL